

### REMARKS

Claims remaining in the present application are Claims 1-25. Claim 1, 6, 14-15 and 24 have been amended. No new matter has been added as a result of these amendments.

### DRAWINGS

Formal drawings are submitted with this response.

### CLAIM REJECTIONS

#### 35 U.S.C. §112

Claims 6, 14-15, and 24 have been objected to for informalities. Applicants present herein amendments that are believed to correct these informalities.

#### 35 U.S.C. §102

#### CLAIM 1

Claim 1 is rejected under 35 U.S.C. §102(b) as being anticipated by Dillon et al. U.S. Patent No. 5,652,795 (hereinafter Dillon). The rejection is respectfully traversed for the following rationale.

Amended Independent Claim 1 recites:

a) receiving an encrypted signal at a first logical circuit of a device;

- b) determining a broadcast encryption key for said encrypted signal at a first location within said device separate from said first logical circuit;
- c) encrypting said broadcast encryption key at said first location;
- d) transferring said encrypted broadcast encryption key to said first logical circuit over a communication link.

Applicants respectfully submit that Dillon fails to teach or suggest these claimed limitations. Applicants note that Dillon appears to teach that the encryption of the keys take place outside of the device, with the encrypted keys being sent to the device. For example, Dillon at col. 5, lines 3-16 describes numerous ways of transferring decryption keys to the user. To the extent that Dillon teaches using a smartcard in the key generation process, Applicants do not understand Dillon to teach or suggest the claim limitations of encrypting the key at a first location in the device and transferring the encrypted key to another location in the device. For example, Applicants do not understand Dillon to teach encrypting the key generated by the smartcard.

For the foregoing reasons, Applicants respectfully assert that Dillon fails to teach or suggest all of the limitations of Claim 1. Therefore, Applicant respectfully requests allowance of Claim 1.

### CLAIMS 10-11

Claims 10-11 are rejected under 35 U.S.C. §102(e) as being anticipated by Mangold et al. U.S. Patent No. 6,668,324 (hereinafter Mangold). The rejection is respectfully traversed for the following rationale.

Claim 10 recites, in part:

b) transferring said local encryption key across a communication link to a first logical circuit and to a second logical circuit (emphasis added).

Mangold fails to teach or suggest the claimed limitation of “transferring said local encryption key across a communication link to a first logical circuit and to a second logical circuit.” The rejection asserts that Mangold at Figure 4 and column 6 teaches the above limitation. However, Applicants respectfully point out that Mangold teaches the use of a first encryption key (content channel encryption key) for transfers over the IEEE 1394 bus for transfers between the VCR (specific input device 110) and the PCX module 106 (Mangold, col. 6, lines 7-15). However, for transfers between the PCX module and the MPEG decoder, a second key is used (Mangold, col. 6, lines 31-45). Thus, in contrast to the claimed, “transferring said local encryption key across a communication link to a first logical circuit and to a second logical circuit,” Mangold teaches transferring a first encryption key across a first communication link to a first single device and transferring a second encryption key across a second communication link to a second single device.

Therefore, Claims 10-11 overcome the cited references under 35 U.S.C. §102.

35 U.S.C. §103

Claims 2-4 and 7-9

Claims 2-4 and 7-9 are rejected under 35 U.S.C. §103(a) as being unpatentable over Dillon in view of Searle, U.S. Patent No. 6,683,984 (hereinafter, Searle). The rejection is respectfully traversed for the following reasons.

Dillon fails to teach or suggest the limitations of, “transferring said encrypted broadcast encryption key to said first logical circuit over a communication link,” and Searle fails to remedy the deficiency in Dillon in that Searle fails to teach or suggest this claimed limitation. Therefore, the combination of Dillon and Searle fails to teach the limitations of Claim 1. As such, dependent Claims 2-4 and 7-9 are respectfully asserted to be allowable by virtue of their dependency from Claim 1.

Claim 5

Claim 5 is rejected under 35 U.S.C. §103(a) as being unpatentable over Dillon in view of Nally, U.S. Patent No. 5,808,629 (hereinafter, Nally). The rejection is respectfully traversed for the following reasons.

Dillon fails to teach or suggest the limitations of, “transferring said encrypted broadcast encryption key to said first logical circuit over a communication link,” and Nally fails to remedy the deficiency in Dillon in that Searle fails to teach or suggest this claimed limitation. Therefore, the combination of Dillon and Nally fails to teach the limitations of Claim 1. As such, dependent Claim 5 is respectfully asserted to be allowable by virtue of its dependency from Claim 1.

#### Claims 5-6

Claims 5-6 are rejected under 35 U.S.C. §103(a) as being unpatentable over Dillon in view of Blatter, U.S. Patent No. 5,878,135 (hereinafter, Blatter). The rejection is respectfully traversed for the following reasons.

Dillon fails to teach or suggest the limitations of, “encrypting said broadcast encryption key at said first location (which is recited as within said device separate from said first logical circuit),” and Blatter fails to remedy the deficiency in Dillon in that Blatter fails to teach or suggest this claimed limitation. Therefore, the combination of Dillon and Blatter fails to teach the limitations of Claim 1. As such, dependent Claims 5-6 are allowable by virtue of their dependency from Claim 1.

Claims 12-13 and 17-18

Claims 12-13 and 17-18 are rejected under 35 U.S.C. §103(a) as being unpatentable over Mangold in view of Searle, U.S. Patent No. 6,683,984 (hereinafter, Searle). The rejection is respectfully traversed for the following reasons.

Applicants respectfully assert that Mangold fails to teach or suggest the limitations of, “transferring said local encryption key across a communication link to a first logical circuit and to a second logical circuit,” and Searle fails to remedy the deficiency in Mangold in that Searle fails to teach or suggest this claimed limitation. Therefore, the combination of Mangold and Searle fails to teach the limitations of Claim 10. As such, dependent Claims 12-13 and 17-18 are respectfully believed to be allowable by virtue of their dependency from Claim 10.

Claims 19-24

Claims 19-24 are rejected under 35 U.S.C. §103(a) as being unpatentable over Mangold in view of Searle, and further yet in view of Nally. The rejection is respectfully traversed for the following reasons.

Applicants respectfully assert that one of ordinary skill in the art would not have been motivated to combine the teachings of Searle with those of Mangold to arrive at the limitations of Claim 19. This is because Searle

teaches a method of preventing encrypted keys from being decrypted by other computing devices. For example, Searle teaches that only the device that encrypts the first key (producing the second key) is able to decrypt the second key. Mangold is concerned with forwarding key information. However, Searle teaches away from forwarding key information. Therefore, one of ordinary skill in the art would not have been motivated to combine Searle's teachings with those of Mangold's to arrive at the limitations of Claim 19.

Applicants respectfully assert that no combination of Mangold and Nally or Searle and Nally would result in the limitations of Claim 19. Therefore, Claim 19 is patentable over Mangold in view of Searle, and further yet in view of Nally.

#### Claim 14

Claim 14 is rejected under 35 U.S.C. §103(a) as being unpatentable over Mangold in view of Blatter. The rejection is respectfully traversed for the following reasons.

Mangold fails to teach or suggest the limitations of, "transferring said local encryption key across a communication link to a first logical circuit and to a second logical circuit," and Blatter fails to remedy the deficiency in Mangold in that Blatter fails to teach or suggest this claimed limitation.

Therefore, the combination of Mangold and Blatter fails to teach the limitations of Claim 10. As such, dependent Claim 14 is respectfully believed to be allowable by virtue of their dependency from Claim 10.

#### Claim 15

Claim 15 is rejected under 35 U.S.C. §103(a) as being unpatentable over Mangold in view of Blatter, in further view of Eyer, U.S. Patent No. 5,485,577 (hereinafter Eyer). The rejection is respectfully traversed for the following reasons.

Mangold fails to teach or suggest the limitations of, “transferring said local encryption key across a communication link to a first logical circuit and to a second logical circuit,” and Blatter and Eyer fail to remedy the deficiency in Mangold in that Blatter and Eyer fail to teach or suggest this claimed limitation. Therefore, the combination of Mangold, Blatter and Eyer fails to teach the limitations of Claim 10. As such, dependent Claim 15 is respectfully believed to be allowable by virtue of their dependency from Claim 10.

#### Claim 16

Claim 16 is rejected under 35 U.S.C. §103(a) as being unpatentable over Mangold in view of Eyer. The rejection is respectfully traversed for the following reasons.



Mangold fails to teach or suggest the limitations of, “transferring said local encryption key across a communication link to a first logical circuit and to a second logical circuit,” and Eyer fail to remedy the deficiency in Mangold in that Eyer fails to teach or suggest this claimed limitation. Therefore, the combination of Mangold and Eyer fail to teach the limitations of Claim 10. As such, dependent Claim 16 is respectfully believed to be allowable by virtue of their dependency from Claim 10.

#### Claim 25

Claim 25 is rejected under 35 U.S.C. §103(a) as being unpatentable over Mangold in view of Searle and Eyer. The rejection is respectfully traversed for the following reasons.

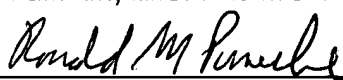
For reasons discussed in the response to Claim 19, the combination of Mangold, Searle and Nally does not teach or suggest the limitations of Claim 19 because Searle teaches away from combining Searle and Mangold to arrive at the claimed limitations. Applicants respectfully assert that combining Eyer with Mangold would not result in the limitations of Claim 19. Therefore, Claim 25 is respectfully believed to be allowable by virtue of its dependency from Claim 19.

### CONCLUSION

Based on the amendments presented above, it is respectfully submitted that Claims 1-25 overcome the rejections of record and, therefore, allowance of Claims 1-25 is respectfully solicited. Should the Examiner have a question regarding the instant amendment and response, the Applicants invite the Examiner to contact the Applicants' undersigned representative at the below listed telephone number.

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Respectfully submitted,  
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